

### **REMARKS**

This Application has been carefully reviewed in light of the Office Action mailed July 2, 2003. Claims 1-40 are pending in the application. Claim 11 has been objected to. Claims 30-33 have been allowed. Claims 1-10, 12-29, and 34-40 stand rejected. Applicants submit that the pending claims are patentably distinguishable over the cited references. Applicants, therefore, respectfully request reconsideration and favorable action in this case.

#### **Section 103 Rejection**

The Examiner rejects Claims 1-10, 12-29, and 34-40 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 5,684,800 to Dobbins, et al. ("*Dobbins*"). Applicants respectfully traverse this rejection and all findings therein for the following reasons.

The Applicants respectfully submit that *Dobbins* fails to disclose, teach, or suggest "point-to-multipoint connectivity between the ports," as recited in Claim 1. *Dobbins*, in contrast, merely discloses point-to-multipoint connections between every switch in a network with accompanying point-to-point contacts between end users or access ports and their corresponding switch. Fig. 5. In particular, *Dobbins* discloses that the switches support "the multicast channel 16 by having a connection in each switch that connects it to all other switches in the network." Col. 6, Lines 54-56. It should be noted that this multipoint connection is only between the switches themselves." Col. 6., Lines 54-60 (emphasis added); See also Fig. 5, Col. 5, Line 66 to Col. 6, Line 1. In fact, *Dobbins* teaches away from point-to-multipoint connections between end systems or access ports, because the invention as disclosed in *Dobbins* would become too cumbersome to include point-to-multipoint connections between end systems or access ports as it is scaled. Col. 6, Lines 60-62; Col. 8, Lines 51-54.

In addition, independent Claim 1 recites, "an identifier operable to represent the port group as a single element to disparate elements." For the teaching of this limitation, in part, the Office Action offers the following passage from *Dobbins*: "Method and apparatus for establishing restricted broadcast groups in a switched network. The method assigns different virtual LAN identifiers (VLAN-IDs) to different subsets of associated end systems or access ports." Abst., Lines 1-4. However, the Applicants submit that assigning an ID to a subset of end users or access ports is not equivalent to an ID that is operable to represent a group of

end users or access ports as a single element. In fact, *Dobbins*, in contrast, merely discloses an ID operable to represent broadcast packets as being sent by a member of the same subset of end users or access ports, allowing each member of the subset to receive the broadcast packets. ABST.; Col. 3, Lines 21-25; Col. 6, Lines 33-45. Moreover, there is no motivation to modify *Dobbins's* device, as suggested by the Office Action, because *Dobbins* does not teach, suggest, or disclose the interaction of a subset of end users or access ports as a single element with any disparate element. Therefore, the Applicants respectfully request the Examiner withdraw the rejection of independent Claim 1.

Independent Claims 16 and 34 are allowable for analogous reasons. Claims 2-10 and 12-15 each depend from independent Claims 1 and are thus patentable over the cited art, for example, for at least the reasons discussed above with regard to Claim 1. Claims 17-29 depend from independent Claims 16 and are thus patentable over the cited art, for example, for at least the reasons discussed above with regard to Claim 16. Claims 35-40 each depend from independent Claims 34 and are thus patentable over the cited art, for example, for at least the reasons discussed above with regard to Claim 34. Applicants respectfully request reconsideration and allowance of these claims.

#### **Objected Claim**

Claim 11 has not been amended as it depends from Claim 1, which, as discussed above, is allowable.

#### **Allowable Subject Matter**

Applicants note with appreciation the allowance of Claims 30-33.

#### **Reconsideration of Information Disclosure Statement**

Applicant requests consideration by the Examiner of the Information Disclosure Statement submitted on June 23, 2003.

**CONCLUSION**

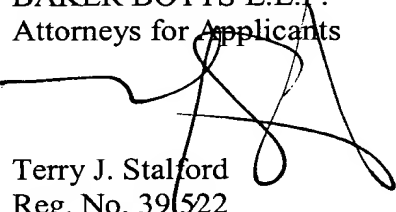
Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all the pending claims.

If the present application is not allowed and/or if one or more of the rejections is maintained, Applicants hereby request a telephone conference with the Examiner and further request that the Examiner contact the undersigned attorney to schedule the telephone conference.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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